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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

James Anthony Davis,

Plaintiff,

Case No. 2:22-cv-01796-RFB-DJA

V

Michael Miney, *et al.*

Defendants.

Stipulation for Revised Scheduling Order

Pursuant to FRCP 16(b)(4) and Local Rule 26-2, the parties stipulate and agree to modify/extend the Scheduling Order (ECF No. 33) and respectfully request the Court to approve the proposed schedule, set forth herein. This is the first stipulation for extension of these deadlines. This request is submitted at least twenty-one (21) days or more before the close of discovery (July 18, 2024) is made in good faith, and is supported by good cause.

1 STATEMENT OF FACTS IN SUPPORT OF STIPULATION

2 On April 5, 2024, most of the Defendants answered Mr. Davis's complaint (ECF
3 32). On April 22, this Court entered a scheduling order contemplating a 90 day period
4 for discovery to be completed, with an end date of July 18, 2024. ECF 33.

5 Counsel for the parties have since conferred, and agree that more time is
6 necessary to complete discovery. Additional time is needed because this is a case
7 involving complex medical issues, with multiple claims concerning different issue,
8 voluminous medical records, and which will likely involve experts. Accordingly the
9 parties would propose the following schedule be adopted, running from May 3, 2024.

- 10 • The parties may engage in a discovery for a period of 180 days, ending
11 on October 30, 2024;
- 12 • Any and all pleadings that may be brought under Fed. R. Civ. P. 13 and
13 14, or joining additional parties under Fed. R. Civ. P. 19 and 20, must
14 be filed within 60 days, which is July 2, 2024. Any party causing
15 additional parties to be joined or brought into this action must
16 contemporaneously serve a copy of this Order on the new party or
17 parties.
- 18 • Amendments to pleadings as provided for under Fed. R. Civ. P. 15, if
19 they are allowed without leave of Court, or motions for leave to amend,
20 must comply with LR 15-1 and must be filed and served within 90 days
21 from the date of this order, which is August 1, 2024.
- 22 • Expert disclosures must be made on or before August 30, 2024, and
23 disclosures of rebuttal experts must be made on or before September 30,
24 2024.
- 25 • Dispositive Motions: that they be filed and served no later than
26 November 29, 2024;

- **Joint Pretrial Order:** that it be due on December 30, 2024. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

CONCLUSION

Based on the foregoing and for good cause appearing, the Parties respectfully request that the Court approve their Stipulation and alter the discovery deadlines as set forth above.

Dated May 7, 2024

Aaron D. Ford
Attorney General

Rene L. Valladares
Federal Public Defender

/s/ *Jessica Brown*

/s/ Ryan Norwood

Jessica Brown
Deputy Attorney General

Ryan Norwood
Assistant Federal Public Defender

IT IS SO ORDERED:


DANIEL J. ALBRECHT

DANIEL J. ALBRECHT
UNITED STATES MAGISTRATE JUDGE

DATED: 5/8/2024